

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of California-American Water Company (U 210 W) for an order authorizing it to increase its rates for water service in its Los Angeles District to increase revenues by \$2,020,466 or 10.88% in the year 2007; \$634,659 or 3.08% in the year 2008; and \$666,422 or 3.14% in the year 2009

A.06-01-005

**COMMENTS OF CALIFORNIA-AMERICAN WATER COMPANY (U 210 W) ON THE
ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY**

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I. INTRODUCTION

Pursuant to Article 14 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), California-American Water Company ("California American Water"), hereby submits its comments on the *Alternate Proposed Decision of Commissioner Peevey*, served July 24, 2007 ("Alternate Decision").

The Alternate Decision represents a noteworthy improvement over the *Proposed Decision of Administrative Law Judge Walwyn* ("Proposed Decision"). California American Water strongly supports the Alternate Decision's conclusion that the Commission should consider the water revenue adjustment mechanism ("WRAM"), modified cost balancing account ("MCBA") and the risks associated with conservation in an industry-wide proceeding. California American Water will also follow the Alternate Decision's recommendation to develop a conservation loss adjustment mechanism ("CLAM") focused on solely on cost under and over-recovery due to conservation policies and present its proposal as part of the second phase of this proceeding.

California American Water is disappointed, however, that the Alternate Decision does not also correct the deficiencies of the Proposed Decision regarding California American

Water's return on equity and the infrastructure system replacement surcharge ("ISRS") program. Like the Proposed Decision, these portions of the Alternate Decision are inequitable, unsupported by the record evidence and contrary to expressed Commission goals and precedent. Pursuant to Rule 14.3(b), California American Water's proposed changes to the Alternate Decision's findings of fact and conclusions of law are attached as Appendix A.

II. THE ALTERNATE DECISION PROPERLY DEFERS CONSIDERATION OF THE WRAM, MCBA AND CONSERVATION RISKS TO AN INDUSTRY-WIDE PROCEEDING

The Alternate Decision finds that "it would be premature to approve a WRAM in one company's GRC, especially a WRAM that has an associated adjustment to ROE."¹ This deferral of consideration of the WRAM and, more importantly, any return on equity adjustment, to an industry-wide proceeding, namely the conservation OII (I.07-01-006, et al.), represents a significant and much-needed change from the Proposed Decision.

A Commission finding in this proceeding that the implementation of a WRAM warrants a substantial return on equity reduction would rashly prejudge the issue. The Proposed Decision makes significant assumptions concerning the impact of a WRAM and MCBA, even though these regulatory mechanisms have not yet been reviewed in this proceeding. Additionally, the record evidence on this issue is scant at best and was produced in haste. As California American Water noted in its comments on the Proposed Decision, what little information there is on the record concerning the issue of a reduction in return on equity for the WRAM was produced in less than two weeks, with little or no opportunity for discovery or cross-examination.

Moreover, not only would it be improper for the Commission to judge the impact of an as-yet unfinalized WRAM on California American Water's return on equity based on a hurriedly produced and inadequate evidentiary record, it would be inappropriate for the

¹ Alternate Decision, p. 34.

Commission to make such a sweeping policy decision in the general rate case of a single water utility. The issue of whether a conservation rate design WRAM warrants a reduction to a water utility's return on equity is one with far-reaching policy implications for the entire water industry. The Alternate Decision is correct that this matter is more appropriately reviewed in an industry-wide proceeding, which will provide the opportunity to vet the issues more thoroughly, rather than making a sweeping policy decision in a vacuum.

III. A CONSERVATION LOSS ADJUSTMENT MECHANISM WILL ALLOW THE COMMISSION TO ADDRESS CONSERVATION-RELATED CHANGES TO RECOVERY WITHOUT HAVING TO MAKE A RETURN ON EQUITY ADJUSTMENT

The Alternate Decision encourages California American Water and the Division of Ratepayer Advocates ("DRA") to develop for the second phase of this proceeding a conservation loss adjustment mechanism, or CLAM, that addresses only under and over-recovery caused by conservation policies. California American Water accepts this recommendation and has already begun considering the parameters such a mechanism. As part of the second phase of this proceeding California American Water will develop a methodology for measuring the changes in water sales due to conservation and a mechanism to address cost underrecovery.

As the Alternate Decision correctly notes, there would be no need for a return on equity adjustment with the CLAM,² because it would only address undercollection of California American Water's authorized fixed costs due to conservation rates and programs and any overcollection due to shifting more cost recovery to the volumetric rate. While a CLAM would address the risk of decreased revenues due to conservation, it would not reduce any of California American Water's currently existing risk. Since there is no reduction in risk, there is no reason to adjust California American Water's return on equity.

² Alternate Decision, p. 35.

IV. THE ALTERNATE DECISION WRONGLY RETAINS THE FLAWED RETURN ON EQUITY ANALYSIS OF THE PROPOSED DECISION

Despite the removal of the WRAM-related reduction, the return on equity set forth in the Alternate Decision is still too low. The Proposed Decision's return on equity analysis, included unchanged in the Alternate Decision, contains legal and factual errors. Moreover, even if the return on equity analysis did not include errors, the conclusions would still be invalid because they fail to take into account California American Water's increased financial risk. The Commission should delete this portion of the Alternate Decision and replace it with language recognizing the need to include a risk factor for California American Water.

A. California American is Riskier Than Comparable Water Utilities

The Alternate Decision parrots the language of the Proposed Decision, stating, "Cal-Am [is] not riskier than comparable utilities."³ The record in this proceeding, however, contradicts this statement. If two companies are similar in terms of business risk (for example, two Commission-regulated Class A water utilities), investors will require a higher return for investing in the water utility that has more debt. Increased debt means increased financial risk, which requires a higher return on equity to attract investment. The comparable water utilities used in the Alternate Decision analysis have lower debt ratios than California American Water.⁴ This means that California American Water's financial risk is higher than the comparable water utilities.⁵ The Alternate Decision's statement regarding the relative riskiness of California American Water is not only unsupported by any citation to the record, but is directly contradicted by the facts of the case.

Because the Alternate Decision does not acknowledge that increased debt does results in increased financial risk, and because it fails to recognize the difference between California American Water's financial risk and that of comparable water utilities, the Alternate

³ Alternate Decision, p. 30.

⁴ See RT 490 (Hoglund/DRA).

⁵ Id.

Decision incorrectly concludes that there is no need to include a risk factor in its analysis of California American Water's return on equity. This is, of course, incorrect. If the comparable companies used in the return on equity analysis had debt/equity ratios similar to California American Water, a risk factor would not be necessary. Since, however, the record shows that California American Water's debt/equity ratio is significantly higher, this increased financial risk must be recognized. If capital structure is not considered when the allowed return on equity is established, companies that are otherwise very similar end up with different returns on investment. Ignoring differences in capital structure results in unequal treatment of similarly situated companies.

B. The Return on Equity Analysis Contains Legal and Factual Errors

In addition to failing to recognize California American Water's increased financial risk, the Alternate Decision's recommended return on equity multiple legal and factual errors. These errors undermine the validity of the suggested return on equity.

1. The Alternate Decision Violates the Legal Standard for Rates of Return

The return on equity set forth in the Alternate Decision fails to meet the standards set forth by the United States Supreme Court in *Bluefield*⁶ and *Hope*.⁷ In setting a rate of return, the Commission must consider the "comparable earnings standard" set forth by the Supreme Court in *Bluefield*. The comparable earnings standard states that the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks.⁸ The comparable earnings standard has come to be interpreted as the rate of return investors expect when they purchase equity shares of comparable risk.

⁶ *Bluefield Water Works & Improvement Co. v. Pub. Service Comm. of the State of Virginia* (1923) 262 U.S. 679.

⁷ *Federal Power Comm. v. Hope Natural Gas Co.* (1944) 320 U.S. 591.

⁸ *Bluefield*, 262 U.S. at 692-693; *Hope*, 320 U.S. at 603.

Under the comparable earnings standard, if two companies are similar in terms of business risk, investors would expect a higher return for investing in the firm that has more debt because it has more financial risk. As noted above, however, the Alternate Decision did not include a risk factor to address the fact that California American Water has greater financial risk than comparable water utilities. The Alternate Decision's analysis therefore does not meet the comparable earnings standard.

The Alternate Decision's recommended return on equity also violates the standards of financial integrity and capital attraction as set forth by the Supreme Court in *Bluefield* and affirmed in *Hope*.⁹ According to *Bluefield* and *Hope*, a utility is entitled to a return that will allow it to maintain its credit so that it continues to have access to the capital markets to raise the funds necessary for investment. The Alternate Decision violates this principle. This is because investors, realizing that an investment in California American Water does not offer a reward commensurate with its risk, would, in accordance with the most fundamental investing principles, pull their money out of California American Water and invest it in any number of assets that offer a fair return.¹⁰

2. The Alternate Decision Perpetuates Significant Factual Errors

The Alternate Decision adopts the factually incorrect statements that were included in the Proposed Decision and uses these incorrect assertions to justify its failure to include a risk factor in its return on equity analysis. For example, the Alternate Decision erroneously states that California American Water's shareholders are "already rewarded for a

⁹ *Bluefield*, 262 U.S. at 693; *Hope*, 320 U.S. at 603-605.

¹⁰ The Alternate Decision attempts to show that California American Water has the ability to attract capital for necessary investment by citing the credit rating of American Water Capital Corporation ("AWCC"). However, the credit worthiness of AWCC is supported by the earnings of subsidiaries in multiple states. Neither the Alternate Decision nor the record offers an analysis or study of the creditworthiness of California American Water on a standalone basis. (Alternate Decision, p. 30.)

lower equity ratio for the amortization of the Citizens premium.”¹¹ Similar to the Proposed Decision, the Alternate Decision fails to provide a citation to the Citizens decision supporting this statement. Shareholder rewards for a lower equity ratio are not part of the recovery of the Citizens acquisition premium;¹² therefore, they cannot be a basis for the rejection of a risk factor for California American Water.

Additionally, the Alternate Decision repeats the Proposed Decision’s allegation that California American Water claimed in the RWE merger proceeding that the merger would provide “significant benefits to ratepayers from savings on cost of capital, specifically from increased leverage.”¹³ This is incorrect. In the RWE proceeding, California American Water limited its discussion of cost of capital benefits to savings related to cost of debt and did not mention increased leverage. This is confirmed in Finding of Fact 12 of the RWE decision, which states, “Cal-Am ratepayers will benefit from this transaction because Cal-Am will have a lower cost of debt and cost of capital as a result of the transaction.”¹⁴ There is no mention of benefits due to increased leverage. Benefits from lower cost of debt and benefits from increased leverage are two different factors, and only the former was addressed in the RWE decision.

The Alternate Decision bases its rejection of a risk factor, at least in part, on the incorrect claims above. This undermines the validity of the Alternate Decision’s return on equity analysis. The Commission should not rely upon and adopt such an analysis.

¹¹ Alternate Decision, pp. 30-31.

¹² See *Application of Citizens Utilities Company of California (U-87-W), a California Corporation, and California-American Water Company*, D. 01-09-057, (2001) 2001 Cal. PUC LEXIS 826.

¹³ Alternate Decision, p. 31.

¹⁴ *Joint Application of California-American Water Company (U-210-W), et al.*, D.02-12-068, (2002) 2002 Cal. PUC LEXIS 909, *82

V. CALIFORNIA AMERICAN WATER'S ISRS PROGRAM IS SUPERIOR TO THE DSIC PROPOSAL

The Alternate Decision adopts unchanged the Distribution System Infrastructure Charge ("DSIC") pilot program set forth in the Proposed Decision. Unfortunately, this modification to California American Water's Infrastructure System Replacement Surcharge ("ISRS") program will only provide additional administrative headaches, instead of the increased regulatory flexibility, that California American Water sought. The Alternate Decision's justification of the DSIC program is based on factual errors and mischaracterizations of California American Water's ISRS program. The DSIC set forth in the Alternate Decision will not advance Water Plan objectives, nor is it likely that other utilities would consider it a model to emulate.

A. The Alternate Decision Mischaracterizes California American Water's ISRS Proposal

The Alternate Decision is contains multiple mischaracterizations and factual errors regarding California American Water's ISRS proposal. As some of these mischaracterizations and errors are the basis for the Alternate Decision's rejection of the proposed ISRS program in favor of the DSIC program, California American Water addresses them below.

First, the Alternate Decision claims that the "record does not show that Cal-Am has experienced any disallowances in its Los Angeles District."¹⁵ This statement, however, is misleading. Although California American Water made its traditional substantial upfront showing for all of its projects in the rate case, even projects that would fall under the ISRS program,¹⁶ it is inefficient to expend this level of resources on ISRS projects, which are routine replacements of existing infrastructure. The ISRS program is needed to maximize the efficiency of the process.

¹⁵ Id., p. 44.

¹⁶ California American Water made this showing because it did not know whether the Commission would adopt the ISRS program.

Second, the Alternate Decision includes statements by a California American Water witness that were taken out of context in the Proposed Decision to allege that California American Water is seeking to remove regulatory risk by assuring full rate recovery without later reasonableness review.¹⁷ This is untrue. California American Water has maintained throughout this proceeding that its ISRS program will actually provide additional regulatory oversight, mainly because it will provide increased reasonableness review after projects are completed. Under the ISRS program, the most meaningful review would take place after the project is completed, using actual data, not just estimates. This enhanced oversight is one of the customer benefits of the ISRS program.

Third, the Alternate Decision wrongly states that one of the benefits of an ISRS program, i.e., the fact that customers would not pay for a project until it is completed, is already provided by advice letters. The Commission usually reserves advice letters for large complex projects that have a level of uncertainty regarding timing or costs. By contrast, ISRS projects are routine replacements of existing infrastructure that are significantly smaller in scale. There is currently no ratemaking mechanism in place that provides all of the benefits of ISRS, including delaying implementation of rate increases, an ongoing level of new investment for routine infrastructure replacements and upgrades, and a separately identified revenue stream for infrastructure investment.

Fourth, the Alternate Decision adopts the Proposed Decision's incorrect conclusion that California American Water is proposing to "delink its level of infrastructure investment from its own asset management plan, the [Comprehensive Planning Study, or] CPS."¹⁸ California American Water has made no such proposal. Instead, California American Water is proposing to undertake a comprehensive review and analysis of infrastructure replacement and upgrade needs for use in future case if the ISRS is approved.

¹⁷ Alternate Decision, p. 44.

¹⁸ Alternate Decision, p. 49.

Fifth, the Alternate Decision claims that adopting an in-depth review of actual infrastructure system replacement projects, with the potential for disallowances of unreasonable costs, is somehow “inconsistent with our regulatory objectives.”¹⁹ After the fact review and disallowances are commonplace, however, under the current regulatory scheme. One example is the tracking of a project’s costs in a memorandum account, which is subject to later reasonableness review and possible disallowance. Similarly, advice letter projects also allow for after the fact review and disallowances. Instead of being inconsistent, California American Water’s proposed ISRS program furthers the Water Action Plan regulatory objectives of promoting infrastructure investment and streamlining Commission regulatory decision making.

B. The Alternate Decision’s DSIC Does Not Achieve the Commission’s Regulatory Objectives

In the name of “effective regulatory oversight” the Alternate Decision adopts its DSIC program, which adds significant additional administrative burdens instead of streamlining the regulatory process as California American Water sought to do with its ISRS program. The pre-approval process described in the Alternate Decision is actually more burdensome than the current process. Additionally, the Tier 3 Advice Letter process would remove administrative efficiencies and increase the potential for delayed recovery in rates. Moreover, even if California American Water or another utility wanted to use the DSIC program as a model, the Alternate Decision includes that language that appears to unnecessarily limit an DSIC pilot program to California American Water’s Los Angeles District.

Adoption of the Alternate Decision’s DSIC program will send the signal to water utilities that the reward for making innovative proposals to further the goals of the Water Action Plan is increased regulatory burdens and resource expenditures. The Commission should reject the DSIC set forth in the Proposed Decision and Alternate Decision and adopt the California American Water’s ISRS program.

¹⁹ Alternate Decision, p. 48.

VI. CONCLUSION

The Alternate's Decision deferral of consideration of the WRAM, the MCBA and any return on equity adjustment to the conservation OII proceeding represents a significant improvement over the Proposed Decision. California American Water commits to developing the CLAM suggested by the Alternate Decision for presentation and review in the second phase of this general rate case. This mechanism will help California American Water promote the Commission's conservation goals and will streamline the regulatory process by bypassing the issue of an adjustment to return on equity.

As discussed above, however, California American Water does not support the Alternate Decision's incorporation of the Proposed Decision's discussion and findings regarding California American Water's return on equity and proposed ISRS program. For all of the foregoing reasons, California American Water respectfully urges the Commission to adopt the Alternate Decision with the modifications discussed above.

Dated: August 13, 2007

Respectfully submitted,

STEEFEL, LEVITT & WEISS
A Professional Corporation

By: 

Lori Anne Dolqueist
Attorneys for Applicant
California-American Water Company

APPENDIX A

Revised Findings of Fact

15. A ROE of ~~10.0%~~ **11.6** in this phase is reasonable based on the record and is fair because the return is commensurate with the returns on investment in comparable companies and is sufficient to (a) assure confidence in the financial integrity of Cal-Am, (b) maintain its credit, and (c) attract necessary capital.

16. A leverage adjustment for Cal-Am's ROE is ~~not~~ warranted.

19. ~~While~~ **Timely** infrastructure replace is an important part component of responsible utility manage and DSICs are useful in some circumstances to fund infrastructure replacement; Cal-Am has ~~not~~ established a need for its proposed ISRS.

20. There are **not** substantial risks to ratepayers in adopting the proposed ISRS, and the record provides strong evidence of this for the Los Angeles District.

21. We should ~~not~~ adopt Cal-Am's proposed ISRS.

22. There are benefits to adoption of a DSIC and we should consider adoption of a pilot program provided we adopt effective regulatory oversight mechanisms.

Revised Conclusions of Law

8. We should adopt as a pilot program for this GRC period a DSIC as follows **Cal-Am's proposed ISRS:**

- a. The surcharge should be based on the infrastructure projects **completed and placed into service during the period covered in the advice letter filing.** reviewed and approved in this proceeding, identified in the Cal-Am/DRA settlement, and have a cap of 7% of annual adopted revenues for the test period. The dollar cap for 2007 is \$1,323,588, and will be adjusted for 2008 and 2009 based on escalation factors.
- b. Cal-Am should file by quarterly advice letter, under the Tier 3 procedures specified in D:07-01-024, for its DSIC surcharge. **The surcharge will be implemented within 15 days of the advice letter filing.** It should explicitly and clearly state in each advice letter filing, and provide supporting documentation, for (1) any project that was not approved in this GRC proceeding, and (2) any project that is included at an amount over the level authorized in this GRC proceeding.
- f. In evaluating projects not included in this GRC review, Water Division should apply the following criteria: Does the expenditure contribute to an adequate ongoing level of new investment for the routine replacement and upgrades that are necessary to maintain adequate water service for customers? For these projects as well as authorized projects with final costs in excess of estimates found reasonable in the GRC, Cal-Am retains the same burden of proof to justify costs that we applied in our GRC review.

PROOF OF SERVICE

I, Michelle Chavez, declare as follows:

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to this action. My business address is STEEFEL, LEVITT & WEISS, One Embarcadero Center, 30th Floor, San Francisco, California 94111-3719. On August 13, 2007, I served the within:


Comments of California-American Water Company (U 210 W) on The Alternate Proposed Decision of Commissioner Peevey

on the interested parties in this action addressed as follows:

See attached service list

- ☒ **(BY HAND SERVICE)** By causing such envelope to be delivered by hand, as addressed by delivering same to SPECIALIZED LEGAL SERVICES with instructions that it be personally served.
- ☒ **(BY MAIL)** By placing such document(s) in a sealed envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at Steefel, Levitt & Weiss, San Francisco, California following ordinary business practice. I am readily familiar with the practice at Steefel, Levitt & Weiss for collection and processing of correspondence for mailing with the United States Postal Service, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.
- ☒ **(BY PUC E-MAIL SERVICE)** By transmitting such document(s) electronically from Steefel, Levitt & Weiss, San Francisco, California, to the electronic mail addresses listed above. I am readily familiar with the practices of Steefel, Levitt & Weiss for transmitting documents by electronic mail, said practice being that in the ordinary course of business, such electronic mail is transmitted immediately after such document has been tendered for filing. Said practice also complies with Rule 1.1 of the Public Utilities Commission of the State of California and all protocols described therein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on August 13, 2007, at San Francisco, California.


Michelle Chavez

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